

LATHAM & WATKINS LLP
Matthew Rawlinson (SBN 231890)
140 Scott Drive
Menlo Park, California 94025
T: (650) 328-4600 / F: (650) 463-2600
matthew.rawlinson@lw.com

Elizabeth Deeley (SBN 230798)
505 Montgomery Street, Suite 2000
San Francisco, California 94111
T: (415) 391-0600 / F: (415) 395-8095
elizabeth.deeley@lw.com

Andrew B. Clubok (*pro hac vice*)
Susan E. Engel (*pro hac vice*)
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004
T: (202) 637-2200 / F: (202) 637-2201
andrew.clubok@lw.com
susan.engel@lw.com

Colleen C. Smith (SBN 231216)
12670 High Bluff Drive
San Diego, California 92130
T: (858) 523-5400 / F: (858) 523-5450
colleen.smith@lw.com

Attorneys for Defendants Lyft, Inc., Logan Green, John Zimmer, Brian Roberts, Prashant (Sean) Aggarwal, Ben Horowitz, Valerie Jarrett, David Lawee, Hiroshi Mikitani, Ann Miura-Ko, and Mary Agnes (Maggie) Wilderotter and Non-Party Jonathan Christodoro

Additional Counsel on Signature Page

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re LYFT INC. SECURITIES LITIGATION

MASTER FILE NO. 4:19-CV-02690-HSG

This Document Relates to:

ALL ACTIONS

**JOINT STIPULATION AND
ORDER TO EXTEND BRIEFING
SCHEDULE ON PLAINTIFF'S
MOTION FOR CLASS
CERTIFICATION**

1 Pursuant to Local Rules 6-2 and 7-12, Defendants Lyft, Inc., Logan Green, John Zimmer,
 2 Brian Roberts, Prashant (Sean) Aggarwal, Jonathan Christodoro, Ben Horowitz, Valerie Jarrett,
 3 David Lawee, Hiroshi Mikitani, Ann Miura-Ko, and Mary Agnes Wilderotter (the “Lyft
 4 Defendants”) and Lead Plaintiff, Rick Keiner (“Plaintiff”, and together with the Lyft Defendants,
 5 the “Parties”), through their counsel, submit the following Joint Stipulation and [Proposed] Order
 6 To Extend Briefing Schedule on Plaintiff’s Motion for Class Certification.

7 WHEREAS, on September 25, 2020, Plaintiff filed a Motion for Class Certification (ECF
 8 No. 98);

9 WHEREAS, the Lyft Defendants’ Opposition to the Motion for Class Certification (the
 10 “Opposition”) was originally due to be filed on October 9, 2020;

11 WHEREAS, the Parties agreed to extend the date for the Opposition from October 9, 2020
 12 to January 12, 2021 and the date for Plaintiff’s Reply in support of his Motion for Class
 13 Certification (the “Reply”) from October 16, 2020 to January 22, 2021 (ECF No. 100);

14 WHEREAS, this Court entered the stipulation as an order of the Court on October 13, 2020
 15 and set a date for hearing on the Motion for Class Certification for February 18, 2021 at 2:00 p.m.
 16 (ECF No. 102);

17 WHEREAS, on December 29, 2020 the Court rescheduled the date for a hearing on the
 18 Motion for Class Certification to March 11, 2021 at 2:00 p.m. (ECF No. 105);

19 WHEREAS, in light of what the Lyft Defendants believe to be the complex issues involved
 20 in the Motion for Class Certification and to accommodate the Lyft Defendants’ request for
 21 adequate time for addressing these issues and for briefing and for Plaintiff to have adequate time
 22 to respond, counsel for the Parties have met and conferred, and agree to extend the date for the
 23 Opposition from January 12, 2021 to January 19, 2021 and the date for Plaintiff’s Reply from
 24 January 22, 2021 to February 5, 2021;

25 WHEREAS, this extension of time will not alter the date of any event or deadline already
 26 fixed by Court order;

27 WHEREAS, this stipulation is not intended to operate as an admission of any factual
 28 allegation or legal conclusion and is submitted subject to and without waiver of any right, defense,

1 affirmative defense, or objection;

2 NOW, THEREFORE, pursuant to Civil Local Rule 6-2, the Parties hereby stipulate,
3 subject to Court approval, that the briefing schedule for the Motion for Class Certification will be
4 modified as follows:

5 1. The Lyft Defendants shall file their Opposition to the Motion for Class Certification
6 by January 19, 2021.

7 2. Plaintiff shall file a Reply in support of his Motion for Class Certification by
8 February 5, 2021.

9
10 Stipulated and agreed to by:

11 Date: January 6, 2021

12
13 **BLOCK & LEVITON LLP**

14 /s/ Jacob A. Walker

15 Jacob A. Walker (CA Bar. No. 271217)
16 260 Franklin Street, Suite 1860
Boston, MA 02110
jake@blockesq.com

17 Lead Counsel and Counsel for Plaintiff

18
19 **LATHAM & WATKINS LLP**

20 /s/ Colleen C. Smith

21 Colleen C. Smith (CA Bar. No. 231216)
12670 High Bluff Drive
San Diego, CA 92130
Colleen.Smith@lw.com

22 Matthew Rawlinson (CA Bar. No. 231890)
140 Scott Drive
Menlo Park, CA 94025
T: (650) 328-4600 / F: (650) 463-2600
matthew.rawlinson@lw.com

23 Elizabeth Deeley (CA Bar. No. 230798)
505 Montgomery Street, Suite 2000
San Francisco, CA 94111
T: (415) 391-0600 / F: (415) 395-8095
elizabeth.deeley@lw.com

24 Andrew B. Clubok (*pro hac vice*)
Susan E. Engel (*pro hac vice*)
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004
T: (202) 637-2200 / F: (202) 637-2201
andrew.clubok@lw.com
susan.engel@lw.com

25
26
27
28 Counsel for Defendants Lyft, Inc., Logan
Green, John Zimmer, Brian Roberts,

1 *Prashant Aggarwal, Jonathan*
2 *Christodoro, Ben Horowitz, Valerie*
3 *Jarrett, David Lawee, Hiroshi Mikitani,*
4 *Ann Miura-Ko, and Mary Agnes*
5 *Wilderotter*

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FILER'S ATTESTATION

Pursuant to Civil L. R. 5-1(i)(3), regarding signatures, I hereby attest that concurrence in the filing of the document has been obtained from all of the signatories above.

Dated: January 6, 2021

/s/ *Colleen C. Smith*
Colleen C. Smith

* * *

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 1/7/2021

Haywood S. Gill Jr.
HONORABLE HAYWOOD S. GILLIAM, JR.
U.S. DISTRICT JUDGE